

April 8, 1999

W.K.Hubbard  
Dockets Mg. Branch (HFA-305)  
Food & Drug Adm.  
5630 Fishers Lane, Rm 1061  
Rockville, MD 20852

6130 '99 APR 15 19:30

**RE: Federal Register Request for Information: Performance Standard for  
Vibrio vulnificus Docket # 98P-0504--Vol.64,no.13,page3300-3301**

Dear Mr. Hubbard,

The FDA has requested information on 8 pts. of interest in regards to issues raised by a petition submitted by Center for Science in the Public Interest.


Effective Public Health policies should not be unilaterally developed by a federal agency based upon the demands of a single special interest group (i.e. CSPI). Public Health policy should be developed using the best available science within the framework of a forum made up of the regulators and the industry. Policies and regulations developed in this manner best assure industry compliance and good public health. The current group, the Interstate Shellfish Sanitation Conference is the appropriate body for dealing with the issues brought forward by CSPI.

In 1998, regulators and the shellfish industry, together thru the ISSC, developed an effective Interim Control Plan for *V. parahaemolyticus* that set far stricter control measures for the industry than was currently required. The Control Plan was effective on the West Coast: illnesses associated with V.p. virtually ceased when the industry voluntarily halted sales of oysters for raw consumption, as called for in the plan.

The control plan calls not only stricter criteria on the part of the industry, it also provides for data collection and further research so that a sound scientific basis can be developed for formulating policy. It should be incumbent on FDA to promote and develop this research, rather than eliminating consumer choice.

I urge the FDA to refer this matter to the ISSC for continued study and at the same time provide the funding and research to develop appropriate criteria for crafting public health policy

Sincerely,

Ralph Rush  
  
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5003 Flager Road  
Nordland, WA 98358

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